

**EXHIBIT A**

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 (1903-1973)  
 PATRICK C. O'DONOGHUE  
 (1930-1979)  
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April 11, 2003

**VIA FACSIMILE AND FIRST CLASS MAIL**

Stuart Ratner, Esq.  
 111 Prospect Street  
 Stamford, CT 06901

Re: Trustees of the Plumbers and Pipefitters National Pension Fund  
 v. Paul S. Yoney, Inc. a/k/a Yoney, Incorporated  
 Civil Action No.

Dear Mr. Ratner:

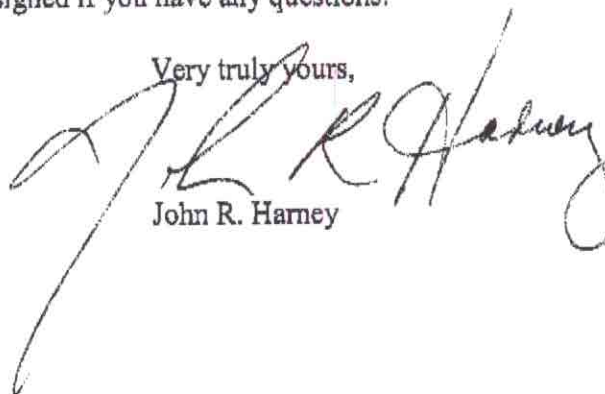
This firm is legal counsel to the Trustees of the Plumbers and Pipefitters National Pension Fund ("National Pension Fund").

I am in receipt of your voice mail message of April 10, 2003 wherein you seem to indicate that we had discussed that the Plaintiffs would withdraw its pending Motion for Contempt scheduled to be heard in Baltimore on April 16, 2003 at 10:00 a.m. upon receipt of all outstanding contributions. You also indicated today that you sent the February 2003 contributions to my office today.

While receipt of the February 2003 contributions 21 days after the Court ordered your client to deliver them is appreciated, the National Pension Fund is not inclined to withdraw its Motion given that your client has never complied with the Injunctive Order since its entry. Please find enclosed a chart indicating that, as a result of its failure to comply with the Injunctive Order, the National Pension Fund is entitled to \$30,361.95 in liquidated damages and \$3,825.95 in interest based on its contribution history since the entry of the Injunctive Order. Additionally, the National Pension Fund will seek attorneys fees and costs to which it is entitled under ERISA § 502(g)(2).

Please contact the undersigned if you have any questions.

Very truly yours,

A handwritten signature in dark ink, appearing to read "J. R. Harney", is written over the typed name. The signature is fluid and cursive.

John R. Harney

JRH:nw

Enclosure

cc: PPNPF, Administrator

103326

## PAUL S. YONEY, INC. a/k/a YONEY INCORPORATED

## NATIONAL PENSION FUND

Interest Assessed at the Rate of 12% Per Annum Through Date of Payment  
CONTRIBUTIONS, LIQUIDATED DAMAGES AND INTEREST:

<u>DATE</u>	<u>CONTRIB. RECEIVED</u>	<u>LIQUIDATED DAMAGES</u>	<u>DAILY INTEREST RATE</u>	<u>DAILY INTEREST</u>	<u>DUE DATE</u>	<u>DATE PAID/ CURRENT DATE</u>	<u>DAYS LATE</u>	<u>TOTAL INTEREST</u>
Feb-97	\$908.00	\$90.80	0.033%	\$0.30	20-Mar-97	27-Mar-97	7	\$2.10
Mar-97	\$864.00	\$86.40	0.033%	\$0.29	20-Apr-97	21-Apr-97	1	\$0.29
Apr-97	\$574.00	\$57.40	0.033%	\$0.19	20-May-97	14-Jul-97	55	\$10.42
May-97	\$726.00	\$72.60	0.033%	\$0.24	20-Jun-97	18-Aug-97	59	\$14.14
Jun-97	\$1,140.00	\$114.00	0.033%	\$0.38	20-Jul-97	18-Sep-97	60	\$22.57
Jul-97	\$2,124.00	\$212.40	0.033%	\$0.70	20-Aug-97	18-Sep-97	29	\$20.33
Aug-97	\$3,633.00	\$363.30	0.033%	\$1.20	20-Sep-97	25-Sep-97	5	\$5.99
Sep-97	\$1,631.00	\$163.10	0.033%	\$0.54	20-Oct-97	17-Nov-97	28	\$15.07
Oct-97	\$2,072.00	\$207.20	0.033%	\$0.68	20-Nov-97	23-Dec-97	33	\$22.56
	\$32.00	\$3.20	0.033%	\$0.01	20-Nov-97	09-Mar-98	109	\$1.15
Nov-97	\$2,021.00	\$202.10	0.033%	\$0.67	20-Dec-97	23-Jan-98	34	\$22.68
Dec-97	\$2,331.00	\$233.10	0.033%	\$0.77	20-Jan-98	27-Feb-98	38	\$29.23
Jan-98	\$3,101.00	\$310.10	0.033%	\$1.02	20-Feb-98	06-Apr-98	45	\$46.05
Feb-98	\$3,138.50	\$313.85	0.033%	\$1.04	20-Mar-98	04-May-98	45	\$46.61
Mar-98	\$3,446.00	\$344.60	0.033%	\$1.14	20-Apr-98	03-Jun-98	44	\$50.04
Apr-98	\$3,570.00	\$357.00	0.033%	\$1.18	20-May-98	06-Jul-98	47	\$55.37
May-98	\$384.00	\$38.40	0.033%	\$0.13	20-Jun-98	10-Jul-98	20	\$2.53
	\$4,739.00	\$473.90	0.033%	\$1.56	20-Jun-98	28-Aug-98	69	\$107.91
Jun-98	\$4,313.00	\$431.30	0.033%	\$1.42	20-Jul-98	21-Sep-98	63	\$89.67
Jul-98	\$6,286.50	\$628.65	0.033%	\$2.07	20-Aug-98	26-Oct-98	67	\$138.99
Aug-98	\$6,329.00	\$632.90	0.033%	\$2.09	20-Sep-98	30-Nov-98	71	\$148.29
Sep-98	\$4,262.00	\$426.20	0.033%	\$1.41	20-Oct-98	04-Jan-99	76	\$106.89
Oct-98	\$6,837.00	\$683.70	0.033%	\$2.26	20-Nov-98	15-Jan-99	56	\$126.35
Nov-98	\$4,554.00	\$455.40	0.033%	\$1.50	20-Dec-98	28-Jan-99	40	\$60.11
Dec-98	\$5,611.50	\$561.15	0.033%	\$1.85	20-Jan-99	24-Feb-99	35	\$64.81
Jan-99	\$7,139.00	\$713.90	0.033%	\$2.36	20-Feb-99	10-Mar-99	18	\$42.41
Feb-99	\$6,268.50	\$626.85	0.033%	\$2.07	20-Mar-99	03-May-99	44	\$91.02
Mar-99	\$6,013.00	\$601.30	0.033%	\$1.68	20-Apr-99	07-May-99	17	\$33.73
Apr-99	\$6,592.00	\$659.20	0.033%	\$2.18	20-May-99	07-Jun-99	18	\$39.16
May-99	\$5,029.00	\$502.90	0.033%	\$1.66	20-Jun-99	08-Jul-99	16	\$26.55
Jun-99	\$5,148.50	\$514.85	0.033%	\$1.70	20-Jul-99	16-Aug-99	27	\$45.87
Jul-99	\$9,387.00	\$938.70	0.033%	\$3.09	20-Aug-99	22-Sep-99	33	\$102.01
Aug-99	\$8,140.50	\$814.05	0.033%	\$2.89	20-Sep-99	05-Nov-99	46	\$123.57
Sep-99	\$8,368.50	\$836.85	0.033%	\$2.10	20-Oct-99	23-Nov-99	34	\$71.45
Oct-99	\$7,663.00	\$766.30	0.033%	\$2.53	20-Nov-99	08-Jan-00	47	\$118.86
Nov-99	\$4,619.00	\$461.90	0.033%	\$1.52	20-Dec-99	21-Jan-00	32	\$48.78
Dec-99	\$4,564.75	\$456.48	0.033%	\$1.51	20-Jan-00	08-Mar-00	48	\$72.31
Jan-00	\$3,755.90	\$375.59	0.033%	\$1.24	20-Feb-00	05-Apr-00	45	\$55.78
Feb-00	\$3,666.75	\$366.68	0.033%	\$1.21	20-Mar-00	18-May-00	59	\$71.39
Mar-00	\$4,890.00	\$489.00	0.033%	\$1.61	20-Apr-00	15-Jun-00	56	\$90.37
Apr-00	\$3,504.00	\$350.40	0.033%	\$1.16	20-May-00	05-Sep-00	108	\$124.88
May-00	\$3,544.00	\$354.40	0.033%	\$1.17	20-Jun-00	10-Aug-00	51	\$59.65
Jun-00	\$3,672.00	\$367.20	0.033%	\$1.21	20-Jul-00	25-Sep-00	67	\$81.19
Jul-00	\$2,986.00	\$298.60	0.033%	\$0.99	20-Aug-00	25-Oct-00	66	\$65.04
Aug-00	\$4,695.20	\$469.52	0.033%	\$1.55	20-Sep-00	25-Oct-00	35	\$54.23
Sep-00	\$2,796.00	\$279.60	0.033%	\$0.92	20-Oct-00	08-Nov-00	19	\$17.53
Oct-00	\$3,090.05	\$309.01	0.033%	\$1.02	20-Nov-00	15-Dec-00	25	\$25.49
Nov-00	\$3,622.50	\$362.25	0.033%	\$1.20	20-Dec-00	29-Dec-00	9	\$10.76
Dec-00	\$2,792.20	\$279.22	0.033%	\$0.92	20-Jan-01	15-Feb-01	26	\$23.96
Jan-01	\$2,248.83	\$224.88	0.033%	\$0.74	20-Feb-01	08-Mar-01	17	\$12.62
Feb-01	\$2,457.55	\$245.76	0.033%	\$0.81	20-Mar-01	30-Apr-01	41	\$33.25
Mar-01	\$2,538.90	\$253.89	0.033%	\$0.84	20-Apr-01	03-May-01	13	\$10.86
Apr-01	\$1,643.35	\$164.34	0.033%	\$0.54	20-May-01	06-Jun-01	17	\$9.22



## PAUL S. YONEY, INC. a/k/a YONEY INCORPORATED

## NATIONAL PENSION FUND

Interest Assessed at the Rate of 12% Per Annum Through Date of Payment

## CONTRIBUTIONS, LIQUIDATED DAMAGES AND INTEREST:

DATE	CONTRIB. RECEIVED	LIQUIDATED DAMAGES	DAILY INTEREST RATE	DAILY INTEREST	DUE DATE	DATE PAID/ CURRENT DATE	DAYS LATE	TOTAL INTEREST
May-01	\$182.27	\$18.23	0.033%	\$0.06	20-Jun-01	18-Jul-01	26	\$1.56
	\$1,674.40	\$167.44	0.033%	\$0.55	20-Jun-01	21-Jun-01	1	\$0.55
Jun-01	\$90.85	\$9.09	0.033%	\$0.03	20-Jul-01	24-Jul-01	4	\$0.12
	151.22	\$15.12	0.033%	\$0.05	20-Jul-01	15-Aug-01	26	\$1.30
	\$1,472.00	\$147.20	0.033%	\$0.49	20-Jul-01	24-Jul-01	4	\$1.94
Jul-01	\$1,664.05	\$166.41	0.033%	\$0.55	20-Aug-01	29-Aug-01	9	\$4.94
Aug-01	\$2,929.69	\$292.96	0.033%	\$0.97	20-Sep-01	24-Sep-01	4	\$3.87
Sep-01	\$2,082.08	\$208.21	0.033%	\$0.69	20-Oct-01	08-Nov-01	19	\$13.05
Oct-01	\$3,187.80	\$318.78	0.033%	\$1.05	20-Nov-01	28-Dec-01	38	\$39.98
Nov-01	\$2,306.33	\$230.63	0.033%	\$0.78	20-Dec-01	12-Feb-02	54	\$41.10
Dec-01	\$2,173.50	\$217.35	0.033%	\$0.72	20-Jan-02	27-Feb-02	38	\$27.26
Jan-02	\$2,888.80	\$288.88	0.033%	\$0.95	20-Feb-02	20-Mar-02	28	\$28.69
Feb-02	\$2,359.80	\$235.98	0.033%	\$0.78	20-Mar-02	06-May-02	47	\$36.60
Mar-02	\$3,277.50	\$327.75	0.033%	\$1.08	20-Apr-02	10-May-02	20	\$21.63
Apr-02	\$4,005.45	\$400.55	0.033%	\$1.32	20-May-02	30-May-02	10	\$13.22
May-02	\$6,462.43	\$646.24	0.033%	\$2.13	20-Jun-02	03-Jul-02	13	\$27.72
Jun-02	\$5,539.55	\$553.96	0.033%	\$1.83	20-Jul-02	31-Jul-02	11	\$20.11
Jul-02	\$6,993.15	\$699.32	0.033%	\$2.31	20-Aug-02	09-Sep-02	20	\$46.15
	\$1,277.65	\$127.77	0.033%	\$0.42	20-Aug-02	11-Oct-02	52	\$21.92
Aug-02	10872.46	\$1,087.25	0.033%	\$3.59	20-Sep-02	11-Oct-02	21	\$75.35
Sep-02	\$8,391.29	\$839.13	0.033%	\$2.77	20-Oct-02	12-Nov-02	23	\$63.69
Oct-02	\$10,803.35	\$1,080.34	0.033%	\$3.50	20-Nov-02	24-Jan-03	65	\$227.44
Nov-02	\$7,372.93	\$737.29	0.033%	\$2.43	20-Dec-02	24-Feb-03	66	\$160.58
Dec-02	\$6,008.35	\$600.84	0.033%	\$1.98	20-Jan-03	10-Mar-03	49	\$97.16
Jan-03	\$6,211.21	\$621.12	0.033%	\$2.05	20-Feb-03	31-Mar-03	39	\$79.94
<b>TOTALS:</b>		<b>\$30,361.95</b>						<b>\$3,825.95</b>